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Chief Magistrate Judge Brian A. Tsuchida

7 UNITED STATES DISTRICT COURT FOR THE
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 24. JEROME RAY WILSON,
14 Defendant.

15 NO. CR18-131RAJ

16 MOTION FOR DETENTION

17
18 The United States moves for pretrial detention of the Defendant, pursuant to 18
19 U.S.C. 3142(e) and (f)

20 1. **Eligibility of Case.** This case is eligible for a detention order because this
21 case involves (check all that apply):

22 Crime of violence (18 U.S.C. 3156).
23 Crime of Terrorism (18 U.S.C. 2332b (g)(5)(B)) with a maximum sentence
24 of ten years or more.
25 Crime with a maximum sentence of life imprisonment or death.
26 Drug offense with a maximum sentence of ten years or more.

- 1 Felony offense and defendant has two prior convictions in the four
2 categories above, or two State convictions that would otherwise fall within
3 these four categories if federal jurisdiction had existed.

- 4 Felony offense involving a minor victim other than a crime of violence.

- 5 Felony offense, other than a crime of violence, involving possession or use
6 of a firearm, destructive device (as those terms are defined in 18 U.S.C.
7 921), or any other dangerous weapon.

- 8 Felony offense other than a crime of violence that involves a failure to
9 register as a Sex Offender (18 U.S.C. 2250).

- 10 Serious risk the defendant will flee.

- 11 Serious risk of obstruction of justice, including intimidation of a
12 prospective witness or juror.

13 2. **Reason for Detention.** The Court should detain defendant because there
14 are no conditions of release which will reasonably assure (check one or both):

- 15 Defendant's appearance as required.

- 16 Safety of any other person and the community.

17 3. **Rebuttable Presumption.** The United States will invoke the rebuttable
18 presumption against defendant under 3142(e). The presumption applies because:

- 19 Probable cause to believe defendant committed offense within five years of
20 release following conviction for a qualifying offense committed while on
21 pretrial release.

- 22 Probable cause to believe defendant committed drug offense with a
23 maximum sentence of ten years or more.

- 24 Probable cause to believe defendant committed a violation of one of the
25 following offenses: 18 U.S.C. 924(c), 956 (conspiracy to murder or
26 kidnap), 2332b (act of terrorism), 2332b(g)(5)(B) (crime of terrorism).

1 Probable cause to believe defendant committed an offense involving a
2 victim under the age of 18 under 18 U.S.C. 1591, 2241, 2242, 2244(a)(1),
3 2245, 2251, 2251A, 2252(a)(1) through 2252(a)(3), 2252A(a)(1) through
4 2252A(a)(4), 2260, 2421, 2422, 2423 or 2425.

4 **4. Time for Detention Hearing.** The United States requests the Court
5 conduct the detention hearing:

6 At the initial appearance
7 After a continuance of 3 days (not more than 3)

9 DATED this 6th day of June, 2018.

11 Respectfully submitted,

13 ANNETTE L. HAYES
14 United States Attorney

15 /s/ Vincent T. Lombardi
16 VINCENT T. LOMBARDI
17 Assistant United States Attorney